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*Attorneys for Defendant*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

PRYMAS VAS,

Plaintiff,

v.

UR M. JADDOU, in her official capacity,  
Director of USCIS; CONNIE NOLAN, in  
her official capacity, USCIS Acting  
Associate Director for SCOPS,

Defendants.

Case No. 2:21-cv-02204-ART-VCF

**Stipulation and Order for Extension  
of Time**

**(First Request)**

Plaintiff PRYMAS VAS, and Defendants UR M. JADDOU, in her official capacity, Director of USCIS and CONNIE NOLAN, in her official capacity, USCIS Acting Associate Director for SCOPS, hereby stipulate and agree that Defendants may have a 30-day extension of time, from May 9, 2022 to June 8, 2022, to respond to Plaintiff's Petition for Writ of Mandamus and Complaint for Declaratory Relief. (ECF No. 3).

This is a mandamus and Administrative Procedure Act action to compel USCIS to adjudicate Plaintiff's U-Visa petition and "application for advance permission to enter as a nonimmigrant." (ECF No. 3 p.2). An extension is warranted for four reasons. First, the agency recently issued Plaintiff a request for evidence ("RFE") and Plaintiff expects to respond to that RFE in two weeks. A 30-day extension would give Plaintiff time to respond

and the agency time to address that response, thereby possibly mooted the case. Second, defense counsel's office has lost a number of attorneys and staff. As a result, defense counsel is handling a higher-than-normal caseload. Third, only a limited number of attorneys and support staff may work in defense counsel's office at any given time due to the pandemic, thereby slowing the time it takes to process and complete required tasks. Fourth, defense counsel's calendar has been busier than normal with multiple filing deadlines in several cases, including one before the Ninth Circuit. Under the circumstances, good cause exists to extend the deadline for Defendants to respond to Plaintiff's Petition for Writ of Mandamus and Complaint for Declaratory Relief. *See* Fed. R. Civ. P. 6(b)(1)(A) ("When an act may or must be done within a specified time, the court may, *for good cause*, extend the time...with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]") (emphasis added).

This is Defendants' first request for an extension of time. *See* LR IA 6-1(a) (must advise of previous extensions). Defense counsel contacted Plaintiff's counsel regarding this extension request, and he has advised that he does not oppose the request. This stipulation is made in good faith and not for the purpose of undue delay.

DATED: May 9, 2022

Bolour/Carl Immigration Group, APC

CHRISTOPHER CHIOU  
Acting United States Attorney

/s/ Scott A. Emerick  
SCOTT A. EMERICK  
Attorney for Plaintiff

/s/ Holly A. Vance  
HOLLY A. VANCE  
Assistant U.S. Attorney  
Attorney for Defendants

**IT IS SO ORDERED.**

Dated: May <sup>10</sup>, 2022.

  
UNITED STATES MAGISTRATE JUDGE